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Attorneys for Defendants
9 *Reed Hein & Associates, LLC dba Timeshare Exit Team,*
Brandon Reed, Trevor Hein, Thomas Parenteau, and
10 *Happy Hour Media Group, LLC*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 DIAMOND RESORTS CORPORATION, a)
Maryland corporation,)

14)
15 Plaintiffs,)

16 vs.)

17 REED HEIN & ASSOCIATES, LLC, d/b/a)
TIMESHARE EXIT TEAM, a Washington limited)
liability company; BRANDON REED, an individual)
18 and citizen of the State of Washington; TREVOR)
HEIN, an individual and citizen of Canada;)
19 THOMAS PARENTEAU, an individual and citizen)
of the State of Washington; HAPPY HOUR MEDIA)
20 GROUP, LLC, a Washington limited liability)
company; MITCHELL REED SUSSMAN, ESQ.)
21 d/b/a THE LAW OFFICES OF MITCHELL REED)
SUSSMAN & ASSOCIATES, an individual citizen)
22 of the State of California; SCHROETER,)
GOLDMARK & BENDER, P.S. A Washington)
23 professional services corporation; and KEN B.)
PRIVETT, ESQ., a citizen of Oklahoma,)

24 Defendants.)
25)

Case No.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER
REGARDING DEADLINE TO
FILE RESPONSE TO
PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER**

[First Stipulation]

26 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiff DIAMOND RESORTS U.S.
27 COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant REED HEIN &
28 ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM ("TET Defendants") (collectively, the

“Parties”) by and through their respective attorneys of record, hereby jointly stipulate as stated below.

STIPULATION

1. On March 4, 2021, Plaintiff filed a Motion for Protective Order related to the deposition of the FRCP 30(b)(6) deposition of Plaintiff (the “Motion”). ECF No. 404.

2. TET Defendants served a joinder to the deposition notice and TET Defendants’ counsel participated in the meet and confer conference regarding the topics. TET Defendants advised Plaintiff that it would be joining in the briefing on the issues that could not be resolved.

3. The deadline for response or opposition to the Motion was March 18, 2021.

4. Plaintiff and SGB submitted a stipulation and order extending the deadline for the response until April 1, 2021, which was granted by the court. ECF No. 406.

5. TET Defendants were not included in the prior stipulation so in an abundance of caution are submitting its own stipulation for the court.

6. In order to adequately address and brief the issues presented in the Motion (ECF No. 404), the Parties agree that TET Defendants deadline to respond to the Motion also be extended up to and including April 1, 2021.

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7. This is the Parties first request for extension of this deadline, and it is not intended to cause any delay or prejudice to any party. Plaintiff does not object to the requested extension.

Dated this 16th day of March, 2021.

GREENSPOON MARDER, LLP

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ORDER

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: 3-16-2021

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